

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

UNITED STATES OF AMERICA,)	Cr. No.: <u>21-cr-175-LM-01</u>
)	
)	
vs.)	
)	18 U.S.C. § 2251(a) & (e)
)	18 U.S.C. § 2260A
CHAD LAWLOR,)	
)	

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

(Production of Child Pornography – 18 U.S.C. §§ 2251(a) & (e))

On or about April 4, 2021, in the District of New Hampshire and elsewhere, the
defendant,

CHAD LAWLOR,

knowingly attempted to and knowingly employed, used, persuaded, induced, enticed, and
coerced N.S., a minor female under the age of 18 years, to engage in sexually explicit conduct
for the purpose of producing a visual depiction of such conduct, using materials that had been
mailed, shipped, and transported in and affecting interstate and foreign commerce by any means,
and the visual depictions were transmitted using any means and facility of interstate and foreign
commerce, and in and affecting interstate and foreign commerce, all in violation of Title 18,
United States Code, Sections 2251 (a) and (e).

COUNT 2

(Production of Child Pornography – 18 U.S.C. §§ 2251(a) & (e))

On or about March 27, 2021, in the District of New Hampshire and elsewhere, the defendant,

CHAD LAWLOR,

knowingly attempted to and knowingly employed, used, persuaded, induced, enticed, and coerced E.H., a minor female under the age of 18 years, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, and the visual depictions were transmitted using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, all in violation of Title 18, United States Code, Sections 2251 (a) and (e).

COUNT 3

(Production of Child Pornography – 18 U.S.C. §§ 2251(a) & (e))

On or about March 27, 2021, in the District of New Hampshire and elsewhere, the defendant,

CHAD LAWLOR,

knowingly attempted to and knowingly employed, used, persuaded, induced, enticed, and coerced H.B., a minor female under the age of 18 years, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, and the visual depictions were transmitted using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, all in violation of Title 18, United States Code, Sections 2251 (a) and (e).

COUNT 4

(Production of Child Pornography – 18 U.S.C. §§ 2251(a) & (e))

On or about March 21, 2021, in the District of New Hampshire and elsewhere, the defendant,

CHAD LAWLOR,

knowingly attempted to and knowingly employed, used, persuaded, induced, enticed, and coerced C.W., a minor female under the age of 18 years, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, and the visual depictions were transmitted using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, all in violation of Title 18, United States Code, Sections 2251 (a) and (e).

COUNT 5

[Felony Offense involving a Minor by a Registered Sex Offender - 18 U.S.C. § 2260A]

On or about April 4, 2021, in the District of New Hampshire, the defendant,

CHAD LAWLOR,

an individual required by Federal or other law to register as a sex offender, committed a felony offense involving a minor under 18 U.S.C. §§ 2251(a) and (e), as charged in Count One of this Indictment, in violation of 18 U.S.C. § 2260A.

NOTICE OF FORFEITURE

Upon conviction of one or more of the offenses alleged in Counts 1 through 5 of this Indictment, the defendant shall forfeit to the United States pursuant to 18 U.S.C. § 2253, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the charged offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the charged offenses, including but not limited to the following: One Samsung cellular telephone, Model SM-A716U, Android ID dd7473439c470315, and one LG cellular telephone, Model LM-X420MM, IMEI 359962-10-857050-6.

TRUE BILL

Dated: October 12, 2021

/s/ Grand Jury Foreperson
Grand Jury Foreperson

JOHN J. FARLEY
Acting United States Attorney

/s/ Kasey A. Weiland
Kasey A. Weiland
Assistant U.S. Attorney